

Use cases

Various use cases to explain how we operate.

- Facing substantial duties importing after Inward processing
- Sanctions on Fuel Products coming from Russian crude
- Common Storage
- Support non EU regions
- Customer Services boundaries
- No response Customs systems

Facing substantial duties importing after Inward processing

We receive a Nomination to import Product (release for free circulation), as the Product does not attract import duties, and then transfer Product to another tank resulting in a blend of two T2 Products.

By mistake the order of events is executed wrongly, whereby the Product to be moved is not declared for free circulation, but transferred as Bonded (T1) and blended with Product in the receiving tank (T2). As a result, the Product is declared for Inward Processing by the automated processes. The blended Product is registered as the new Product and subsequently declared for the release for free circulation. The system now shows the impact in terms of import duties, including anti-dumping duties, asking the User to confirm that he wants to proceed knowing the impact. Here the panic kicks in.

Product specifics of the Blended product:

1. Commodity code: 2710 1942 29
2. Origin: US

What ways are to be considered to mitigate the risk / avoid the issue?

Sanctions on Fuel Products coming from Russian crude

As per January 2026, additional Measures are imposed related to the sanctions against Russia. This requires the inclusion of Additional References in the Customs declarations. We have automated processes to do our customs declarations.

1. How can we avoid the interference of our automated processes? If you need to explain the functional requirements to a developer, how would you explain the functionality to work?
2. It seems, given overall priorities, the development of any automated solution will not be ready in time. How would you manage any interim period to avoid non-compliance?
3. Any other things to consider from risk and liability point of view?

Common Storage

The concept of Common Storage is built on certain principles, where the basis is that the goods stored under Common Storage are 'the same'. A definition not black and white.

1. What do you see as a benefit of applying Common Storage? Or, in other words, if Common Storage would not be allowed, what would be the practical consequence and why would that matter?
2. With fluid bulk products there will always be small differences in terms of density. What inevitable impact does applying Common Storage have from a duty standpoint? Why should this be a consideration?
3. What other features does the customs legislation offer, built on the same principles as Common Storage and can you explain the key differences?
4. Knowing the topic of Common Storage is complex, eligible for interpretation and a topic of discussion within customs authorities, how would you mitigate risks versus commercial incentive?

Support non EU regions

In South Africa shit hits the fan in relation to Customs. Local colleagues have hired a customs consultant and they indicate that the challenge is under control. Only having this information, what would be your approach when this matter comes to your desk through the grapevine? Do you put your nose into this business or just keep it on your radar should any questions come? Please explain any steps you would see fit and what your idea is to manage such matters?

Customer Services boundaries

Customer contacts the Terminal to say that they have a great opportunity for a deal to make big money. A prerequisite for the deal is that the Product is of Norwegian origin. The physical Product they want to sell is on board the vessel and has a Malaysian origin. In tank they have the same Product with Norwegian origin, so the idea is to berth on the jetty at the terminal and then administratively transfer the origins. So the Product on board gets the Norwegian origin and the Product in tank gets the Malaysian origin for the same quantity.

What would be your thoughts and considerations on facilitating this? You only came across this information because you happened to be at the Terminal overhearing this discussion. Would that call for any action from your side and, if so, what could those actions be?

No response Customs systems

Terminal calls late Friday night that a Vessel is loaded and wants to leave, but there is no response from the Customs system. There is no known outage published on the Customs website. Our colleagues at the Terminal have followed the procedure and tried to contact the Customs authorities, but no one answers. Customer is starting to complain and threatens to hold us accountable for demurrage.

What would be your call on letting the Vessel leave?